

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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IN RE:

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T.R.A. DOCKET ROOM

PETITION OF TENNESSEE-
AMERICAN WATER COMPANY TO
CHANGE AND INCREASE CERTAIN
RATES AND CHARGES ...

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DOCKET NO. 03-00118

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**CHATTANOOGA MANUFACTURERS ASSOCIATION'S SECOND SUPPLEMENTAL
RESPONSES AND OBJECTIONS TO TAWC'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to *Rules 26, 33 and 34 of the Tennessee Rules of Civil Procedure and Tenn. Code Ann. §4-5-301, et seq.*, Intervenor Chattanooga Manufacturers Association ("CMA") submits its second supplemental responses to the First Set of Interrogatories and Request for Production of Documents of Tennessee-American Water Company ("TAWC" or the "Company"), subject to and without waiving any of the objections made in any previous pleading or herein.

SUPPLEMENTAL RESPONSES TO DISCOVERY REQUESTS

Subject to and without waiving any prior objections, the following additional responses are provided:

Discovery Request No. 1: State in detail the legal and factual basis for any objection or opposition CMA has with respect to any aspect of the rate increase requested by TAWC in this docket.

Response 1. CMA supplements its prior responses and refers Petitioner to the Direct Testimony filed in this matter opposing the proposed rate increase.

Discovery Request No. 2: Identify each person whom you expect to call as an expert witness at any hearing in this docket, and for each such expert witness:

- a. Identify the field in which the witness is to be offered as an expert.

- b. Provide complete background information, including the expert's current employer as well as his or her educational, professional and employment history and qualifications within the field in which the witness is expected to testify, and identify all publications written or presentations presented in whole or in part by the witness.
- c. Provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion.
- d. Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony.
- e. Identify for each such expert any person whom the expert consulted or otherwise communicated with in connection with his expected testimony.
- f. Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony and opinions as well as the compensation to be paid for the testimony and opinions.
- g. Identify all documents or things shown to, delivered to, received from, relied upon or prepared by any expert witness, which are related to the witness(es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that expert for review in connection with testimony and opinions.
- h. Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert.

Response 2. CMA previously identified Mr. Michael Gorman of Brubaker & Associates, Inc. (BAI) consultants as its possible expert witness to testify regarding this matter, and his pre-filed testimony is being submitted in support of CMA's position in this matter. A schedule of Mr. Gorman's testimony in other matters is attached hereto as *Appendix B*, as his professional credentials were filed previously.

Discovery Request No. 4: Please provide all materials provided to, reviewed by or produced by any expert or consultant retained by CMA to testify or to provide information from which another expert will testify concerning this case.

Response 4. CMA has provided BAI the internet address for materials filed in this docket and also provided hard copies of some documents filed, but unobtainable from or not maintained on the electronic docket; newspaper articles; and, news releases (and similar materials) prepared by and provided to CMA by the Company.

Discovery Request No. 5: Please produce all workpapers of any of CMA's proposed experts, including but not limited to file notes, chart notes, tests, test results, interview and/or consult notes and all other file documentation that nay of CMA's expert witnesses in any way used, created, generated or consulted by any of CMA's expert witnesses in connection with the evaluation, conclusions and opinions in the captioned matter.

Response 5. Please refer to Mr. Gorman's pre-filed direct testimony.

Discovery Request No. 6: Please produce a copy of all trade articles, journals, treatises and publications of any kind in any way utilized or relied upon by any of CMA's proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in the captioned matter.

Response 6. Please refer to Mr. Gorman's pre-filed direct testimony.

Discovery Request No. 7: Please produce a copy of all documents which relate or pertain to any factual information provided to, gathered by, utilized or relied upon by any of CMA's proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in the captioned matter.

Response 7. Please refer to Mr. Gorman's pre-filed direct testimony.

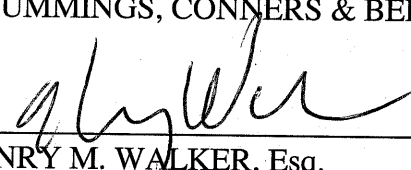
Discovery Request No. 8: Please produce a copy of all articles, journals, books or speeches written by or co-written by any of CMA's expert witnesses, whether published or not.

Response 8. None.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

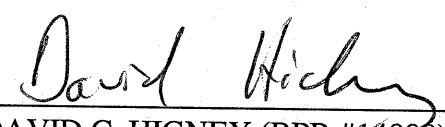
By: _____


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By: _____


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CERTIFICATE OF SERVICE

I hereby certify that I have on this June 2, ~~day of May~~, 2003, served the foregoing pleading either by fax, overnight delivery service or first class mail, postage prepaid, to all parties of record at their addresses shown below:

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BOULT, CUMMINGS, CONNERS & BERRY, PLC

Brubaker & Associates, Inc.
Testimony Filed in Regulatory Proceedings
Michael Gorman

Project	Company	State	Docket	Date	Subject 1	Subject 2	Subject 3
6819	WISCONSIN ELECTRIC POWER COMPANY	WI	6630-UR-110	01/98	Rate Case Filing		
6627	ENTERGY GULF STATES, INC.	LA	U-22092	03/98	Financial Strength	Securitization Bonds	
6628	ENTERGY LOUISIANA	LA	U-20925	03/98	Financial Strength	Securitization Bonds	
6898	SOUTH CAROLINA PIPELINE CORPORATION	SC	90-588-G	05/98	Cost of Common Equity		
6628	LOUISIANA PUBLIC SERVICE COMMISSION	LA	U-20925	05/98	Financial Strength	Securitization	
6627	LOUISIANA PUBLIC SERVICE COMMISSION	LA	U-20922	05/98	Financial Strength	Securitization	
6894	LAQUEDE GAS COMPANY	MO	GR-98-374	08/98	Cost of Common Equity		
6847	WISCONSIN PUBLIC SERVICE CORPORATION	WI	6690-UR-111	09/98	Cost of Common Equity		
6885	ILLINOIS COMMERCE COMMISSION	IL	98-0544	09/98	Financial Analysis		
6833	GREEN MOUNTAIN POWER CORPORATION	VT	6107	09/98	Revenue Requirement		
6885	ILLINOIS COMMERCE COMMISSION	IL	98-0544	09/98	Financial Analysis		
6873	GEORGIA POWER COMPANY	GA	9365-U	10/98	Cost of Service		
6627	ENTERGY GULF STATES, INC.	LA	U-22092-SC	12/98	Financial Ratios		
7077	AMEREN/CP&S/UE	IL	99-0121	04/99	Cost of Service		
7078	CENTRAL ILLINOIS LIGHT COMPANY	IL	99-0119	04/99	Return on Equity		
7079	COMMONWEALTH EDISON COMPANY	IL	99-0117	04/99	Rate of Return		
7079	COMMONWEALTH EDISON COMPANY	IL	99-0117	05/99	Rate of Return		
7077	AMEREN/CP&S/UE	IL	99-0121	05/99	Rate of Return		
7154	WEST VIRGINIA PUBLIC SERVICE COMMISSION	WV	98-0452-E-GI	07/99	Stranded Cost		
7133	CONSUMERS ENERGY COMPANY	MI	U-11560	07/99	Revenue Requirement		
7132	DETROIT EDISON COMPANY, THE	MI	U-11495	07/99	Revenue Requirement		
7154	WEST VIRGINIA PUBLIC SERVICE COMMISSION	WV	98-0452-E-GI	08/99	Stranded Cost		
6100	WISCONSIN POWER AND LIGHT COMPANY	WI	9403-YI-100, 6680-LJM-100	09/99	Cash Flow		
6100	WISCONSIN PUBLIC SERVICE COMMISSION	WI	9403-YI-100, 6680-LJM-100	09/99	Asset Cap		
7133	CONSUMERS ENERGY COMPANY	MI	U-11560	10/99	Asset Cap		
7132	DETROIT EDISON COMPANY, THE	MI	U-11495	11/99	Revenue Requirement		
7246	CENTRAL POWER AND LIGHT COMPANY	TX	21528	11/99	Revenue Requirement		
7288	TXU ELECTRIC COMPANY	TX	21527	11/99	Securitization Analysis		
7133	CONSUMERS ENERGY COMPANY	MI	U-11560	12/99	Revenue Requirement		
7277	PACIFICORP	WY	2000-ER-99-145	12/99	Rate of Return		
7373	AT&O ELECTRIC	AB		07/00	Return on Equity		
7406	EPCOR TRANSMISSION, INC.	AB		07/00	Performance Based Rate Making	Return on Equity	
7405	TRANSALTA UTILITIES CORPORATION	AB		07/00	Return on Equity		Revenue Requirements

Brubaker & Associates, Inc.
Testimony Filed in Regulatory Proceedings
Michael Gorman

Project	Company	State	Docket	Date	Subject 1	Subject 2	Subject 3
7356	WISCONSIN PUBLIC SERVICE CORPORATION	WI	6690-UR-112	08/00	Depreciation Expense		
7368	ILLINOIS-AMERICAN WATER COMPANY	IL	00-0340	08/00	Return on Equity	Revenue Allocation	Rate Design
7307	RELANT ENERGY HL&P	TX	22365	09/00	CTC Revenue Requirement	Acquisition Cost	Acquisition Savings
7310	TEXAS-NEW MEXICO POWER COMPANY	TX	22349	09/00	CTC Revenue Requirement		
7368	ILLINOIS-AMERICAN WATER COMPANY	IL	00-0340	10/00	Return on Equity	Revenue Allocation	Rate Design
7375	CENTRAL POWER AND LIGHT COMPANY	TX	22362	10/00	CTC Revenue Requirement		
7308	TXU ELECTRIC COMPANY	TX	22350	10/00	Revenue Requirement		
7315	VARIOUS UTILITIES	TX	22344	10/00	Capital Structure		
7308	TXU ELECTRIC COMPANY	TX	22350	11/00	Cost of Service	Return on Equity	
6833	GREEN MOUNTAIN POWER CORPORATION	VT	6107	11/00	Revenue Requirement	Financial Integrity	
7479	ILLINOIS-AMERICAN WATER COMPANY	IL	00-0476	11/00	Merger		
7307	RELANT ENERGY HL&P	TX	22365	12/00	Revenue Requirement		
7303	ENTERGY GULF STATES, INC.	TX	22366	01/01	Revenue Requirement		
7479	ILLINOIS-AMERICAN WATER COMPANY	IL	00-0476	01/01	Shared Savings Plan	Cost of Service	
7518	PACIFICORP	UT	01-035-01	01/01	Interim Rate Relief	Acquisition Adjustment	
7556	WISCONSIN ELECTRIC POWER COMPANY	MI	U-12725	04/01	Cost of Capital	Rate of Return	
7582	CONSUMERS ENERGY COMPANY	MI	U-12752	04/01	Gas Cost Recovery	Gas Acquisition Strategy	
7556	WISCONSIN ELECTRIC POWER COMPANY	MI	U-12725	04/01	Cost of Capital	Rate of Return	
7439	AMERICAN TRANSMISSION COMPANY LLC	US	ER01-677-000	05/01	Rate of Return		
7559	AMERENCIPOSLUE	IL	00-0802	06/01	Delivery Service Rates		
7600	NORTHERN INDIANA PUBLIC SERVICE COMPANY	IN	41746	06/01	Return on Equity	Rate of Return	
7518	PACIFICORP	UT	01-035-01	06/01	Income Tax Expense		
7518	PACIFICORP	UT	01-035-01	08/01	Financial Integrity		
7600	NORTHERN INDIANA PUBLIC SERVICE COMPANY	IN	41746	08/01	Rate of Return		
7642	AQUASOURCE UTILITY, INC.	TX	Multiple	08/01	Capital Structure	Earnings Entitlement	
7676	PACIFICORP	WY	20000-EP-01-167,20000-E 08/01	08/01	Rate Design	Return on Equity	
7626	ILLINOIS POWER COMPANY	IL	01-0432	09/01	Return on Equity		
7633	GEORGIA POWER COMPANY	GA	14000-U	10/01	Return on Equity		
7707	PACIFICORP	UT	01-035-23 Interim	10/01	Rate Design		
7626	ILLINOIS POWER COMPANY	IL	01-0432	11/01	Return on Equity		
7708	WISCONSIN GAS COMPANY	WI	6650-SB-109	11/01	Capital Structure		
7718	FLORIDA POWER CORPORATION	FL	000824-EI	01/02	Revenue Requirement	Cost of Service	Financial Integrity
7671	WISCONSIN POWER & LIGHT COMPANY	WI	6680-UR-111	02/02	Interim Rate Increase		
7671	WISCONSIN POWER & LIGHT COMPANY	WI	6680-UR-111	02/02	Rate Increase		

Brubaker & Associates, Inc.
Testimony Filed in Regulatory Proceedings
Michael Gorman

Project	Company	State	Docket	Date	Subject 1	Subject 2	Subject 3
7788	EMPIRE STATE PIPELINE COMPANY INC.	NY	01-G-1406	03/02	Tax Expense Issues		
7671	WISCONSIN POWER & LIGHT COMPANY	WI	6680-UR-111	03/02	Long-Term Common Equity Ratio	Dividend Payments	
7671	WISCONSIN POWER & LIGHT COMPANY	WI	6680-UR-111	03/02	Fair Return on Common Equity		
7651	AMERENUE	MO	EC-2002-1	05/02	Rate of Return		
7752	RELIANT ENERGY ARKLA	AR	01-243-U	05/02	Rate of Return		
7651	AMERENUE	MO	EC-2002-1	06/02	Return on Common Equity		
7829	MIDWEST INDEPENDENT TRANSMISSION SYSTEM OPERATOR, INC.	US	ER02-1963-000	06/02	Return on Common Equity		
7752	RELIANT ENERGY ARKLA	AR	01-243-U	07/02	Return on Common Equity		
7783	INTERSTATE POWER AND LIGHT COMPANY	IA	RPU-02-3	07/02	Return on Common Equity		
7792	OKLAHOMA GAS AND ELECTRIC COMPANY	OK	PUD-200100455	08/02	Return on Common Equity		
7766	WISCONSIN ELECTRIC POWER COMPANY	WI	05-AE-109,05-CE-117,05-CE-130	08/02	Generation Resource Financing		
7792	OKLAHOMA GAS AND ELECTRIC COMPANY	OK	PUD-200100455	09/02	Return on Common Equity		
7783	INTERSTATE POWER AND LIGHT COMPANY	IA	RPU-02-3	09/02	Return on Common Equity		
7812	WISCONSIN POWER & LIGHT COMPANY	WI	6680-UR-112	10/02	Capital Structure		
7855	INTERSTATE POWER AND LIGHT COMPANY	IA	RPU-02-7	10/02	Return on Common Equity		
7812	WISCONSIN POWER & LIGHT COMPANY	WI	6680-UR-112	10/02	Capital Structure		
7812	WISCONSIN POWER & LIGHT COMPANY	WI	6680-UR-112	11/02	Capital Structure		
7902	SOUTH CAROLINA ELECTRIC & GAS COMPANY	SC	2002-223-E	11/02	Return on Common Equity		
7836	PUBLIC SERVICE COMPANY OF COLORADO	CO	02S-315DG	11/02	Cost of Capital		
7911	ILLINOIS POWER COMPANY	IL	02-0742, 02-0743, 02-0754	12/02	Financial Issues		
7911	ILLINOIS POWER COMPANY	IL	02-0742 and 02-0743	02/03	Financial Issues		
7897	ILLINOIS-AMERICAN WATER COMPANY	IL	02-0680	02/03	Revenue Requirement		
7897	ILLINOIS-AMERICAN WATER COMPANY	IL	02-0680	04/03	Revenue Requirement		